## REMARKS

Applicant thanks the Examiner for the Examiner's comments, which have greatly assisted Applicant in responding. Applicant respectfully requests that the Amendment

5  After Final Office Action be admitted under 37 C.F.R. 1.116.

Applicants submit that this amendment presents claims in better form for consideration on appeal. Applicants submit that, thus, there is a good and sufficient reason why this amendment is necessary, why this amendment was not earlier presented, and why this

10  amendment should be admitted now. Furthermore, applicants believe that consideration of this amendment could lead to favorable action that would remove one or more issues for appeal.

Claims 1-35 are pending in the present application.

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### Claim Rejections Under 35 USC § 103

Claims 1-35 were rejected under 35 USC § 103 (a) as being unpatentable over U.S. Patent No. 6,553,341 to Mullaly (hereinafter "Mullaly") in view of International

20  Publication No. WO92/17838, PCT/EP/91/01642 to Diehl et al. (hereinafter "Diehl"). Applicants respectfully submit that Mullaly and Diehl, taken alone or in combination, fail to teach, suggest, or render obvious the present invention as claimed.

Independent Claims 1, 14, 20, 24, and 30 recite respectively a method, system, and/or computer program product for transforming and canonicalizing semantically structured data, comprising *inter alia*, generating grammatical sentences or phrases from the obtained data according to a specific user interface (Claims 1, 14, 20, 24, and 30), the

5     generated grammatical phrases being in a second format associated with the specific user interface (Claims 20, 24, and 30).

The Office Action states that Mullaly and Diehl, taken alone or in combination, teach each and every element of independent Claims 1, 14, 20, 24, and 30. Applicants

10    respectfully disagree.

The Office Action states at page 3, that Mullaly fails to teach or suggest a method, system, and/or computer program product for transforming and canonicalizing semantically structured data, comprising *inter alia*, generating grammatical sentences or

15    phrases from the obtained data according to a specific user interface (Claims 1, 14, 20, 24, and 30), the generated grammatical phrases being in a second format associated with the specific user interface (Claims 20, 24, and 30).

Diehl does not remedy any of the deficiencies of Mullaly. Diehl discloses a method for

20    specifying user interfaces and a programming system running a multiple user interface type computer. *See* Abstract.

Diehl fails to teach or suggest a method, system, and/or computer program product for transforming and canonicalizing semantically structured data, comprising *inter alia*,

generating grammatical sentences or phrases from the obtained data according to a specific user interface (Claims 1, 14, 20, 24, and 30), the generated grammatical phrases being in a second format associated with the specific user interface (Claims 20, 24, and 30). At most, in the cited portions of Diehl, Diehl teaches a specific

5  implementation of user interfaces and integrated facilities, such as ability to switch dynamically between different user interface types. Diehl does not teach or suggest anywhere in the specification a method, system, and/or computer program product for transforming and canonicalizing semantically structured data, comprising *inter alia*, generating grammatical sentences or phrases from the obtained data according to a

10  specific user interface (Claims 1, 14, 20, 24, and 30), the generated grammatical phrases being in a second format associated with the specific user interface (Claims 20, 24, and 30).

Furthermore, Mullaly fails to teach or suggest a combination with Diehl, and Diehl fails

15  to teach or suggest a combination with Mullaly. Mullaly is concerned with filtering of email messages and with transforming announcement text containing text from the filtered messages into synthesized speech and does not contemplate generating grammatical sentences from the obtained data according to a specific user interface, while Diehl discloses support of multiple user interface types by a programming system,

20  but does not contemplate generation of grammatical sentences or phrases from the obtained data according to a specific user interface. It would be impermissible hindsight based on Applicants' own disclosure to combine the teachings of Diehl into Mullaly and to arrive at the present invention as claimed. Moreover, such a combination would still fail to teach or suggest a method, system, and/or computer program product for
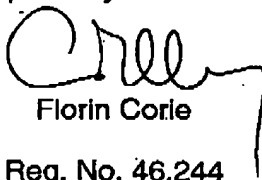
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transforming and canonicalizing semantically structured data, comprising *inter alia*, generating grammatical sentences or phrases from the obtained data according to a specific user interface (Claims 1, 14, 20, 24, and 30), the generated grammatical phrases being in a second format associated with the specific user interface (Claims 20,

5  24, and 30).

Applicants respectfully submit that independent Claims 1, 14, 20, 24, and 30 are thus distinguishable over Mullaly and Diehl, taken alone or in combination, and should be allowed. Claims 2-13, 15-19, 21-23, 25-29, and 31-35, dependent directly or indirectly

10  from independent Claims 1, 14, 20, 24, and 30, respectively, are also distinguishable over Mulally and Diehl, taken alone or in combination, and should also be allowed at least for the same reasons as stated above. Thus, Applicants respectfully request withdrawal of the rejections and allowance of the Claims.

## CONCLUSION

Based on the foregoing, Applicants consider the claimed invention to be distinguished

from the art of record.    Accordingly, Applicants earnestly solicit the Examiner's

5    withdrawal of the rejections raised in the above referenced Final Office Action, such that

a Notice of Allowance is forwarded to Applicant, and the present application is therefore

allowed to issue as a United States Patent.

Respectfully Submitted,

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